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FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2021 FEB 25 PM 5:20

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DONTA MADISON,

Defendant.

CRIMINAL NO. JKB-21-037  
JKB-21-037

(Distribution and Possession with the  
Intent to Distribute Controlled  
Substances, 21 U.S.C. § 841;  
Forfeiture, 21 U.S.C. § 853, and 28  
U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Distribution of CDS)

The Grand Jury for the District of Maryland charges that:

On or about November 19, 2020, in the District of Maryland, the defendant,

**DONTA MADISON,**

did knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a).

21 U.S.C. § 841

**FORFEITURE ALLEGATION**

The United States Attorney for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's convictions.

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Count One, the Defendant convicted of such offense(s), shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense(s); and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense(s).

**Substitute Assets**

3. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant(s) up to the value of the property charged with forfeiture in the paragraphs above.

21 U.S.C. § 853  
28 U.S.C. § 2461(c)

JFL/ by



Jonathan F. Lenzner  
Acting United States Attorney

A TRUE BILL:

REDACTED

Foreperson

2/25/2021

Date